

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

WILLIAM RAY SPRAY, JR., and)
RHONDA JEAN SPRAY, Individually)
and as Personal Representatives)
of the ESTATE OF SINDI LUCILLE)
SPRAY, Deceased,)

Plaintiff(s),)

-vs-)

Case No. CIV-20-1252-C

BOARD OF COUNTY COMMISSIONERS)
OF OKLAHOMA COUNTY, in its)
Official Capacity as Governing)
Body of the County of Oklahoma)
County,)

Defendant(s).)

DEPOSITION OF GINGER SANFORD (F/K/A VANN), RN

TAKEN ON BEHALF OF THE PLAINTIFF(S)

IN OKLAHOMA CITY, OKLAHOMA

ON SEPTEMBER 29, 2022

REPORTED BY: LESLIE A. FOSTER, RPR

GINGER SANFORD, RN

WHEREUPON,

GINGER SANFORD (F/K/A VANN), RN,
of lawful age, being first duly sworn, deposes and says
in reply to the questions propounded as follows:

EXAMINATION

BY MR. SHADID:

Q Will you please state your full name for the
record.

A Ginger Nicole Sanford.

Q Are you the same person that used to be called
Ginger Vann?

A Yes.

Q That worked at the Oklahoma County Jail?

A Yes.

Q When did you become Ginger Stanford?

A Sanford.

Q Stanford?

A No. S-A-N-F-O-R-D.

Q I'm sorry.

A You're good.

Q S-A-N- --

A -- F-O-R-D.

Q When did you become Ms. Sanford?

A 2/6 of '21.

Q Your husband's name?

GINGER SANFORD, RN

1 **A** Yes.

2 **Q** -- at the Oklahoma County Jail?

3 **A** Yes.

4 **Q** After the Sindi Spray incident -- or event, how
5 long did you remain at the Oklahoma County Jail?

6 **A** Maybe 30 days, 60 at most.

7 **Q** Why did you leave?

8 **A** Because of her incident.

9 **Q** After you left the Oklahoma County Jail, did
10 you leave Turn Key also?

11 **A** Yes.

12 **Q** Where did you go from there?

13 **A** To Lifeline.

14 **Q** And from Lifeline to -- I'm sorry. Shift Key?

15 **A** Uh-huh. Yes.

16 **Q** Are you married?

17 **A** Yes.

18 **Q** Your husband's name?

19 **A** Jeremy.

20 **Q** What does Jeremy do?

21 **A** Mechanic.

22 **Q** Where does he work?

23 **A** For himself.

24 **Q** For himself?

25 **A** Yes.

GINGER SANFORD, RN

1 **A** Okay.

2 **Q** "She told me, 'My stomach hurts bad.'"

3 **A** Yes.

4 **Q** Is that what she told you?

5 **A** Yes.

6 **Q** And you did report it?

7 **A** Yes.

8 **Q** If you wanted to make a chart entry -- as an
9 example, if you'll use that example -- or that
10 Exhibit 17, you go toward the back of it, to page -- just
11 a minute. Well, I'm not finding it. If you'll look at
12 page 106 where it says "Chart notes."

13 **A** Yes.

14 **Q** As a medical assistant or a advanced -- I'm
15 sorry. I forgot the exact letters that you said.

16 **A** Advanced certified medication aide.

17 **Q** Under any of those titles, were you allowed to
18 make entries of the physical condition of the patient
19 into a chart like this?

20 **A** No.

21 **Q** There are some entries, I think, that show your
22 name. I just want you to verify. If you'll look at
23 page 83 of this exhibit.

24 **A** (Witness complying with request.)

25 **Q** From about the fifth entry to the tenth entry,

GINGER SANFORD, RN

1 **Q** But that's it?

2 **A** Uh-huh.

3 **Q** That's a "yes" for the record?

4 **A** Yes. Yes.

5 **Q** My review of these documents does not show your
6 name again, to my knowledge, and I would invite you to
7 take a look through and see if I missed anything.
8 Because if you were there somewhere else, please tell me.

9 I think the MAR starts on page 82.

10 **A** Not there.

11 **Q** Is there any other type of document where your
12 name would be entered other than under the MAR?

13 **A** No.

14 **Q** I am assuming from that, that we just looked
15 at, that you didn't see Sindi Spray before this timeframe
16 on December 16th --

17 **A** No.

18 **Q** -- when you made the med pass?

19 **A** Right.

20 **Q** When you're making the med pass -- before you
21 actually dispense the medication -- what do you have in
22 your possession that tells you what to do for any
23 particular detainee?

24 **A** It's on the list on the laptop, and it's just
25 medications that are due or not due or refused or not

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1 given. And, like, you'll see some of these say "not
2 present," some of them say "refused." Like, mine say
3 "received," it's because she took the meds that day.

4 Q Did Sindi Spray take all of the medications
5 that you gave her at that time?

6 A Yes.

7 Q This -- did you call it dicyclomine?

8 A Yes.

9 Q On page 83, the entry for dicyclomine says "PRN
10 for abdominal pain."

11 A Yes.

12 Q Does that mean before the script was handed
13 out, that this type of entry was made by somebody for
14 what the dicyclomine was for?

15 A That means when it was ordered, that's what it
16 was ordered for.

17 Q And I guess what I'm trying to find out, that
18 preceded you giving out the medicine?

19 A Yes.

20 Q Would that have been on your laptop screen at
21 the time you dispensed?

22 A Yes. It's listed somewhat like this is.

23 Q Does the laptop screen that you would have
24 had -- did it generally look like this, or did it appear
25 differently?

1 A It was a little bit different. I mean, you had
2 inmate information, medications, and then you had your
3 buttons of --

4 Q But would the entry that said "dicyclomine" and
5 then it's got the formal name and the amount and then it
6 says "PRN" --

7 A Yeah.

8 Q -- "for abdominal pain," would that have been
9 on there?

10 A Yes. Yes. Because it's an as-needed
11 medication.

12 Q That's what PRN is. Right?

13 A Yes.

14 Q Before you made the med pass where these
15 medications were handed out to Sindi Spray on
16 December 16, 2018, at approximately 12:36 -- I'm sorry,
17 12:31, 12:32, it says, P.M. Before that, had you ever
18 had any contact with Sindi Spray at all?

19 A No.

20 Q You didn't know who she was?

21 A No.

22 Q Why don't you tell us as best you can exactly
23 what happened when you encountered Sindi Spray on
24 December 16, 2018.

25 A I was doing my med pass. Her and her cellmate

1 came out. She wasn't doing very well at all, obviously.

2 She --

3 Q Which "she," the cellmate or Sindi?

4 A Sindi. She leaned up against the wall and kind
5 of -- kind of slid, sat down on the floor. I had asked
6 her if she was okay. And she said no, her stomach hurt.
7 And I asked her if she was detoxing from anything. She
8 told me heroin. She -- she said her legs weren't working
9 properly, so me and the officer finished the couple other
10 cells. And I had her fill out a sick call, which I ended
11 up helping her fill out the sick call. And I -- I took
12 it -- I parked my cart in the sally port, and I took it
13 straight up to Shirley on 13 and I told Shirley, you
14 know, "She's bad. I think she needs to be sent out." I
15 asked her if she'd go down there and look at her. I got
16 a, "She's fine. I seen her at 9:00 this morning for a
17 breathing treatment." And I tried to argue. We ended up
18 getting into an argument over it. I walked out of the
19 clinic, went back downstairs, told her that I told them.

20 Q Told who?

21 A Told Sindi.

22 Q Told Sindi that you -- you went back to Sindi's
23 cell?

24 A Yeah. Oh, yeah. I had to finish the pod, my
25 med pass in the pod.

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1 **Q** Stop for a second. You went back to Sindi
2 Spray's cell?

3 **A** I was probably a couple -- maybe couple cells
4 down.

5 **Q** Okay.

6 **A** But they were at the door. Her roommate was
7 freaking out.

8 **Q** Was Sindi's door open or closed?

9 **A** No. It was closed.

10 **Q** I'm trying to get a picture. You said you went
11 back and told her -- I'm sorry. You told her what?

12 **A** Well, I kind of -- I hollered it, really. I
13 was a couple cells down, and I told her that I told them
14 and they would be down to look at her. I guess they
15 never went. I left after that.

16 **Q** Okay. Stop for a second. I'm going to put on
17 this rather short video. It's about five minutes long.

18 **A** Okay.

19 **Q** You haven't seen it. Is that correct? Or at
20 least with me?

21 **A** Not with you, no.

22 **Q** Have you seen it before?

23 **A** I don't know if it's the same video that
24 investigations showed me at the jail or -- or not.

25 **Q** Well, let's find out.

1 A Okay.

2 Q Ms. Sanford, before we start this video, let me
3 clarify for the record, let me make sure we're clear.
4 Have I shown you any video whatsoever?

5 A No.

6 Q I'm going to start this. And it starts at --
7 you'll see little timestamps up here to the top left.

8 A Yes.

9 Q This is starting on December 16, 2018, at
10 12:30:02. And before I actually have it rolling, are you
11 oriented as you look at this to see where her cell is?

12 A Yeah.

13 Q Do you know which one it is?

14 A Yes.

15 Q Why don't you describe it to us on this
16 particular shot before I have it moving.

17 A I believe she was in 18.

18 Q I think we're going to see differently, but
19 I'll roll it and you just follow along. Are you in the
20 picture right now?

21 A Maybe 16. Yes, I am.

22 Q Where are you right now before we start this?

23 A To the left at Cell -- let's see -- 10. Yeah.

24 Q Are you --

25 A No. 10.

1 Q -- the person in the blue scrubs?

2 A Yes.

3 Q Over to the left of this picture?

4 A Yes.

5 Q Is that the medical cart that you're standing
6 next to?

7 A Yes.

8 (Video playing.)

9 Q (BY MR. SHADID) Okay. I've started it. I'll
10 stop it every now and then. Just tell us what's
11 happening. You're now moving --

12 A Yes. I just gave them in 10, their meds.
13 Nobody else got meds until I got --

14 Q I'm stopping it right now at 12:30:26. And
15 I'll start it again, but you've moved the cart pretty
16 close to a pillar, the pink -- pink pillar?

17 A Yes.

18 Q Whatever you call it. I'm starting it again.

19 (Video playing.)

20 Q (BY MR. SHADID) Who is it that's walked out
21 into the center of the picture at 12:30:28 and 29?

22 A In the black?

23 Q In the black?

24 A That's Alexis Breshers.

25 Q Started it again.

1 (Video playing.)

2 Q (BY MR. SHADID) I think we see the door to Cell
3 16 open, do we not?

4 A Yes, we do.

5 Q What is it you're doing during this timeframe
6 at about 12:30:45?

7 A I'm pulling medication.

8 Q Is there a computer screen on top of that cart?

9 A Yes.

10 Q That's where you fill in whether or not
11 something's been received or refused?

12 A Yes.

13 Q That's the medical screen -- I'm sorry. That's
14 the screen that also showed whether or not these
15 medications were ordered for a particular purpose?

16 A Yes.

17 Q The video has gone to 12:31:32. You're still
18 standing by the cart and now somebody's just walked out.
19 Would that be the cellmate or do you know?

20 A Yes.

21 Q You know?

22 A Yes. That's the cellmate.

23 Q Can you tell us what is happening between you
24 and the cellmate there?

25 A I was pulling her meds, and she was telling me

1 how sick Sindi was.

2 Q Let's stop it for a second. I'm stopping it at
3 12:31:56. What was the cellmate telling you about how
4 sick Sindi was?

5 A She said she needed help. She said,
6 "Something's wrong. She needs help."

7 Q From where you were at that point here, have
8 you seen Sindi yet?

9 A No.

10 Q I'm going to turn it on again.

11 (Video playing.)

12 Q (BY MR. SHADID) And now at about 12:32:45,
13 you're walking around the cart to the other side of the
14 pink pillar. Is that correct?

15 A Yes.

16 Q Can you tell us what you're doing?

17 A Getting water.

18 Q Why were you getting water?

19 A For Sindi. She was on the floor.

20 Q Have you bent down to the floor now as we're
21 seeing at 12:33:09?

22 A Yes.

23 Q Can you tell us what position Sindi was in
24 while you were down there on the floor giving her water?

25 A She was sitting on her bottom, I believe, with

1 her legs together, kind of falling over on the floor.

2 Q I'm stopping it right now at 12:33:25. Can you
3 kind of tell us the position of her torso compared to her
4 legs? Which way were her legs pointing?

5 A If I remember right, to the right. Like, her
6 knees were pointed to the right.

7 Q To her right?

8 A Yeah.

9 Q Turning it back on.

10 (Video playing.)

11 Q (BY MR. SHADID) Why don't you just tell us
12 what's happening as best you can. Obviously, we
13 cannot -- those of us that were not there, obviously,
14 can't see into the cell.

15 A I was giving her her medication.

16 Q Was she on the floor when you were giving her
17 the medications?

18 A Yes.

19 Q Did she take the medications?

20 A Yes.

21 Q Did she take them while she was on the floor?

22 A Yes.

23 Q Now we see you walking back around to the front
24 side of the cart at about 12:34:05. What are you doing
25 now? Anything -- well, just tell us what you're doing.

1 A I'm actually helping her back in the cell.
2 Q Now at about 12:34:27 or 28 you're helping her
3 back into the cell?
4 A Yeah.
5 Q How did you do that?
6 A Somewhat picked her up.
7 Q Did you help pick her up?
8 A Yeah.
9 Q Did the cellmate?
10 A I don't know. I can't remember.
11 Q Why don't you tell us to the extent that you do
12 remember how you helped pick her up.
13 A I just kind of got under her arm and picked her
14 up.
15 Q Did you get under her arms from the back side,
16 or were you on her front side?
17 A No. I was facing her.
18 Q Now the cart is being moved away. The cell
19 door is closed at 12:35 -- I think it was 05 or 10. This
20 is about to stop. It's now stopped at 12:35:21. That's
21 the end of this video clip.
22 A I did hand her food tray into her cellmate at
23 that time, too.
24 Q What -- you did or --
25 A I don't --

1 Q I'm sorry. You did or did not?

2 A I did. I did. She had a food tray, and I gave
3 it to her -- her cellmate right before the door got
4 closed, I believe.

5 Q Well, are those food trays on the floor by her
6 cell?

7 A Yes.

8 Q Well, I'm a little confused. You gave the food
9 tray to Sindi --

10 A Yes.

11 Q -- or to her cellmate or both?

12 A No. I gave one to her cellmate.

13 Q Before the door was closed?

14 A Yes.

15 Q So there were two --

16 A I believe so.

17 Q There were two of them before the door was
18 closed?

19 A Yes. I believe so, yes.

20 Q All right.

21 A Because there's one, two, three, four --

22 Q Is the video that you're -- that we just looked
23 at, the video that you saw from the investigations
24 people?

25 A This is part of it.

1 Q What else did you see from the investigations
2 people?

3 A After I finished the bottom of that pod, I put
4 my cart into the sally port, and I went up to the clinic
5 and talked to Shirley about getting her sent out.

6 Q We have another video here that might show the
7 area that you're talking about.

8 A Okay.

9 Q I don't think it shows you, but I'm going to
10 ask you to take a look at this and see if this shows the
11 area that you're talking about.

12 A Okay.

13 Q When you say "the sally port." Is the area
14 that you now see -- this is one that says --

15 (Video playing.)

16 Q (BY MR. SHADID) I meant to stop this. I want
17 to make that larger. We have put up on the screen one
18 that's marked December 16, 2018. It says "6th Floor
19 Charlie Pod 1" and "6th Floor Charlie Pod 2." This is at
20 9:23:41 A.M. Focusing on the bottom image that you see
21 there, is that the area where you said -- what'd you call
22 it? The sally port?

23 A Yes.

24 Q Is that even close to where it is?

25 A It's to the right of the bubble.

1 Q I'm sorry. To the right of what?

2 A The bubble on the bottom screen, the windows.

3 That's --

4 Q The windows?

5 A That's the bubble.

6 Q So the -- what you call the sally port is -- is
7 it back --

8 A To the right.

9 Q -- around to the right of it?

10 A Yes.

11 Q And just -- I don't have anything else to show
12 you on that. I just want to learn. How far do you have
13 to go around to park your cart in the sally port?

14 A 10, 15 feet.

15 Q And then where did you go after you placed your
16 cart in the sally port?

17 A Straight to the --

18 Q You said you went --

19 A -- clinic.

20 Q -- upstairs?

21 A Straight to the clinic.

22 Q How do you do that? What's your route?

23 A Go out of the -- out of the pod and I can't
24 remember if it was to the right or to the left because
25 there's four pods on each floor. But you get on the

1 elevator and go upstairs.

2 Q Is that what you did?

3 A That's exactly what I did. And investigations
4 has a video that showed me walking into the clinic. They
5 followed me through the building.

6 Q So you've seen that yourself?

7 A I've seen that myself, yes.

8 Q Did that video include you being on 13?

9 A Yes.

10 Q When you went to 13, first, did anybody go with
11 you --

12 A No.

13 Q -- up the elevator?

14 A No.

15 Q Before you deposited the med cart at the sally
16 port, did you have any conversation with Lieutenant
17 Breshers? She was Corporal Breshers at the time.

18 A Right.

19 Q Did you have any conversation with her
20 regarding Sindi Spray before you went up to 13?

21 A Yes.

22 Q What was your conversation with her?

23 A I knew she was bad. I told her, I said, "She
24 needs to be sent out." Which me and Breshers -- I mean,
25 we were friends, too, so --

1 Q What does sent out mean?

2 A To the hospital.

3 Q You mean outside of the --

4 A Like outside --

5 Q -- of the facility?

6 A -- of the jail to the hospital.

7 Q What made you think that?

8 A She couldn't walk. Her stomach hurt, she
9 couldn't walk. She was detoxing on heroin.

10 Q Her stomach hurt -- okay. Now, what did
11 Breshers tell you?

12 A She said that she took her that morning up
13 there and they really didn't do anything, so --

14 Q Up there, does that mean --

15 A To 13.

16 Q -- to the clinic?

17 A So that's another reason why I went straight up
18 there. I mean, other than -- I mean, she obviously
19 needed to go out. She couldn't -- she couldn't walk.

20 She -- I mean, her stomach hurt. She was obviously
21 detoxing. Heroin detox is not good. It's not easy.

22 Q But the part about stomach hurting and not
23 being able to walk, that's not a regular thing with
24 detox, is it?

25 A Stomach can be. The not being able to walk,

1 no. I've never heard of that being part of detoxing.

2 Q But you thought she needed some help?

3 A I knew she needed help.

4 Q You went to 13. Just tell us what happened,
5 one step at a time.

6 A Shirley was in a clinic, and she was the charge
7 nurse. So she was in a clinic room. I tried to
8 interrupt. Didn't work all that great. She came out. I
9 started telling her, I'm like, "She needs to go out." Her
10 chart -- she can't walk. I had to help her back in the
11 cell." And --

12 Q You're referring to Sindi --

13 A Yes.

14 Q -- when you said that --

15 A Yes.

16 Q -- she can't walk?

17 A Yes. And I got told, "She's fine. I seen her
18 this morning for a breathing treatment."

19 I said, "But she can't walk, and her stomach
20 hurts."

21 And she very rudely said, "I said she's fine."

22 And I kind of went off. I can't remember
23 exactly what I said, but it wasn't nice and I was loud.
24 And I went back down to 6.

25 Q Then what happened?

1 A I finished my med pass and then I left for the
2 day.

3 Q A little bit ago, you said that you yelled
4 something, "Tell Sindi that they were going to" --

5 A Yeah.

6 Q -- "be checking on her"?

7 A I told her that somebody would be down to check
8 on her.

9 Q What led you to believe that?

10 A I figured somebody would go down there.

11 Q Okay. Was that your last interaction with
12 Sindi?

13 A (Witness nodding head.)

14 Q Is that a "yes" for the record?

15 A Yes.

16 Q What was your next communication or anything,
17 anything regarding Sindi Spray?

18 A The next morning, I woke up and had a breaking
19 news alert on my phone. And I opened it. It was from
20 Channel 9. And her picture was on it. And it said
21 "Inmate dies at Oklahoma County Jail." And I called
22 Bonnie Jergens and I told her I tried to tell her she
23 needed to go to the hospital.

24 Q Who's Bonnie Jergens?

25 A She was our DON.

1 Q Now, is this a phone call you made?

2 A Yes.

3 Q This is the morning after --

4 A Yes.

5 Q -- Sindi's death?

6 A Yes. I was off that day.

7 Q When you called Bonnie -- is it Jergens?

8 A Yes.

9 Q J-E-R-G-E-N-S.

10 THE COURT REPORTER: Thank you.

11 Q (BY MR. SHADID) Did you use a cell phone?

12 A Yes.

13 Q Your report -- or your statement says that you
14 called Ms. Jergens on her cell phone. Did you have her
15 number?

16 A I had it. I --

17 Q I mean, you had it?

18 A I probably still do.

19 Q You had it at the time?

20 A Yes.

21 Q According to your report or your statement,
22 Bonnie asked, "Did you do what you were supposed to do
23 and tell somebody?" Is that accurate?

24 A Yes.

25 Q You told her that, yes, you had reported it --

1 A Yes.

2 Q -- to her. Which her are you referring to in
3 the statement?

4 A Shirley.

5 Q And then it says "Then she told me, quote,
6 'Well, okay. Don't worry about it. Let somebody else
7 deal with it,' closed quoted"?

8 A Yes.

9 Q Are those words that Ms. Jergens said?

10 A Yes.

11 Q Was there anything else between you and
12 Ms. Jergens other than what you've reported here --

13 A No.

14 Q -- and --

15 A Not that I remember.

16 Q Okay. Then you noted -- or you stated in your
17 report -- I keep saying report. In your witness
18 statement, whatever you want to call this -- that Bonnie
19 did not notify the HSA of your conversation with her,
20 with Bonnie. Is that correct?

21 A Yes.

22 Q How did you learn that?

23 A That's what investigations told me, I believe.

24 Q Do you remember who you spoke with as far as
25 somebody from investigations?

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1 **A** Detective Lyons.
2 **Q** Is that --
3 **A** Lyons.
4 **Q** Is that L-Y-O-N-S?
5 **A** Yes.
6 **Q** Do you know the first name of Detective Lyons?
7 **A** I don't.
8 **Q** Is that a male person?
9 **A** Yes.
10 **Q** Do you know if the -- did you have a formal
11 interview with Detective Lyons?
12 **A** Yes.
13 **Q** Do you know if it was recorded?
14 **A** I have no idea. I can't remember. I mean, it
15 may have.
16 **Q** Did you ever have any further conversations
17 with Shirley Reisch, now Shirley Hadden, after you
18 submitted -- strike that -- after -- strike the whole
19 question.
20 Did you ever have any further conversations
21 with Shirley Reisch, now referred to as Shirley Hadden,
22 regarding Sindi Spray after you spoke with her that day
23 on 13?
24 **A** No.
25 **Q** When you went back to work, you had no other

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1 conversations with her about it?

2 **A** No.

3 **Q** Other than investigations, did you ever speak
4 to anybody else about Sindi Spray up at the -- anybody
5 from the County?

6 **A** I talked to Breshers about it.

7 **Q** Why don't you tell us about those
8 conversations.

9 **A** We were both just -- we were both so heartbroke
10 and so mad that nobody helped her. I mean --

11 **Q** You and Breshers talked about that?

12 **A** Yes.

13 **Q** Did you talk to anybody else about it, other
14 than -- I know you talked to investigations?

15 **A** Yeah, I talked to investigations, but, no, not
16 that I can remember.

17 **Q** This type of situation, as we have learned
18 about with Sindi Spray, was this a one-time experience,
19 or had you seen this type of thing happen before?

20 **A** Every day. It happened every day. People's
21 medical just thrown to the wayside, mental health thrown
22 to the wayside. It happens on a daily basis.

23 **Q** Would you explain it in as much detail as you
24 can?

25 **A** Sick calls get thrown in the trash.

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1 **Q** Sick calls, that's -- I haven't asked you about
2 that. You -- let me stop you for a second.

3 **A** Okay.

4 **Q** This thing called a sick call, is that a piece
5 of paper?

6 **A** It is.

7 **Q** Did Sindi Spray, to your knowledge, write out a
8 sick call?

9 **A** I did for her.

10 **Q** When you wrote it for her, did she sign
11 anything, or did you just write it out?

12 **A** She -- she signed it the best she could. She
13 was too weak to do a whole lot of anything. She just
14 kind of --

15 **Q** Now, did that happen during the time that you
16 were on the other side of that pillar and in the --

17 **A** I believe so. I believe that's why I got in
18 the bottom drawer.

19 **Q** We saw you come out and get in the bottom
20 drawer -- bottom, I think it was left-hand drawer.

21 **A** Yeah.

22 **Q** So if you filled it out -- I don't have it. Do
23 you have any recollection of what you put on it?

24 **A** I know I put her stomach pain, I know I put her
25 not being able to walk, and I put her detoxing on heroin.

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1 As far as anything else, I'm not real sure. I don't know
2 exactly how I worded it all.

3 Q Would there have been any requests on that
4 piece of paper?

5 A No. Because that's a request in itself. A
6 sick call's a request to see medical personnel.

7 Q What did you do with that piece of paper?

8 A I gave it to Shirley.

9 Q Is that during the time that you mentioned here
10 a few minutes ago when you went up and talked to her
11 after seeing Sindi Spray?

12 A I believe so, yes.

13 Q Do you know what happened to it after you gave
14 it to Shirley?

15 A I have no idea.

16 Q Did she make any comment to you about receiving
17 that piece of paper or what she was going to do with it?

18 A No.

19 Q Was there anybody else with you and Shirley
20 when you were talking to each other on December 16th,
21 that afternoon, when you went up to 13?

22 A Not that I can remember.

23 Q Now, let's go back to a minute ago. You were
24 saying that this stuff happens all the time, and that's
25 how we got off on this deal about sick -- what'd you call

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1 it?

2 **A** Sick calls.

3 **Q** Sick calls?

4 **A** Yeah.

5 **Q** What happens to sick calls?

6 **A** They go ignored. Some of them end up in the
7 trash.

8 **Q** Have you seen that yourself?

9 **A** Oh, yes.

10 **Q** You've seen them in the trash?

11 **A** Oh, yes. It's a -- "Oh, they just want
12 attention," or, "I'm not seeing them for that. They
13 just -- they want to get out of their cell," or -- I
14 mean, it --

15 **Q** You've heard those things?

16 **A** Oh, yeah.

17 **Q** Where were you when you heard those kind of
18 things?

19 **A** In the clinic.

20 **Q** On 13?

21 **A** On 13. Heard it every day.

22 **Q** Did you hear that kind of -- those kind of
23 remarks from people beyond Shirley Reisch?

24 **A** Yeah.

25 **Q** Other -- other people were doing that, too?

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1 **A** Oh, everybody. There was a lot of people --
2 James -- you can say it right. I can't say it --
3 Constanzer --

4 **Q** I think that was it.

5 **A** He was horrible to people, too. They -- they
6 treat people in that jail like livestock. Actually,
7 livestock probably gets treated better than they do.

8 **Q** Would you call it a regular event?

9 **A** Oh, yeah.

10 **Q** Routine?

11 **A** Absolutely.

12 **Q** Customary?

13 **A** Yes. And that -- you know, you were asking me
14 about the signature.

15 **Q** I was asking about the signature on this
16 document called "Sentinel event review."

17 **A** Yes.

18 **Q** And what'd we mark that?

19 **A** That may be Constanzer's signature.

20 **Q** It's on Exhibit 25. I was asking previously
21 about this signature at the bottom of the second page.

22 **A** Yes.

23 **Q** That's the one you said might be --

24 **A** That may be --

25 **Q** -- Constanzer's.

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1 **A** -- Constanzer's signature. Possibly. He's the
2 only one I know up there with a C last name.

3 **Q** Did you ever see the news interview that Sindi
4 Spray's roommate or cellmate gave to Channel 9 News?

5 **A** I can't recall seeing that, no.

6 MR. SHADID: Let's go off for a minute.

7 (Off the record at 3:29 P.M.)

8 (On the record at 3:46 P.M.)

9 **Q** (BY MR. SHADID) Is what you've described here
10 today regarding the situation with Sindi Spray -- I'm
11 going to ask this in different ways, and you just tell me
12 if I'm misstating anything.

13 Would the situation and the response that Sindi
14 Spray got be a fairly regular, routine event with the
15 other detainees also?

16 **A** Yes.

17 **Q** In terms of the times or type of response?

18 **A** Yes.

19 **Q** And in terms of the type of actual handling of
20 medical complaints from detainees, is the type of thing
21 that happened with Sindi Spray something that you would
22 consider to be routine, regular, customary in terms of
23 the handling of medical care?

24 **A** Yes.

25 **Q** After the Sindi Spray situation and after you

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1 wrote your statement and whatnot, why don't you tell us
2 how your next 30 or 60 days were at the jail. Just tell
3 us what -- what was going on with you.

4 **A** It was horrible. It was horrible. I was an
5 emotional wreck. My family was feeling it.

6 **Q** When you mean your family, who do you mean?

7 **A** My kids, my husband. I --

8 **Q** Did you seek any help?

9 **A** I talked to the doctor a couple times about it.

10 **Q** You don't have to go into any detail between
11 you and your doctor. I'm just asking if you sought any
12 help.

13 **A** I did. I did.

14 **Q** Did you continue working at the jail?

15 **A** Until the investigation was done. And --

16 **Q** Tell us approximately when that was, just
17 roughly.

18 **A** Probably the 30 days -- I mean, as soon as it
19 was done, I quit.

20 **Q** How were you informed that the investigation
21 was done?

22 **A** Lyons told me.

23 **Q** How was that communicated to you? Did Lyons
24 just come and talk to you or what happened?

25 **A** Pretty much. I seen him in passing, and I

1 said, "So how's the investigation coming?" And --
2 because it was rumored that me and Breshers were going to
3 get, quote, unquote, charges because of her death. And
4 he said it was done. It was over with.

5 Q When you say "rumors," was that just talk
6 around the jail?

7 A It was.

8 Q Did that ever come from any law enforcement
9 people?

10 A Not -- I mean, not anybody --

11 Q Did it --

12 A -- of any kind of --

13 Q -- did it come from Lyons?

14 A No. No.

15 Q Or investigator Phillips Hall?

16 A No.

17 Q As far as --

18 A I don't even know for sure that I know who
19 Phillips Hall is.

20 Q But then you found out the investigation was
21 over?

22 A It was over.

23 Q Did Lyons tell you what the result of the
24 investigation was?

25 A No. No.

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1 **Q** Just that it was over?

2 **A** Yes.

3 **Q** Then what did you do?

4 **A** I quit.

5 **Q** When you quit, did you submit any type of
6 written documentation --

7 **A** No, I did not.

8 **Q** -- to the jail or to Turn Key?

9 **A** No, I did not.

10 **Q** How did you communicate that you were quitting?

11 **A** I called Turn Key office and told them I
12 wouldn't be back.

13 **Q** Did you tell them why?

14 **A** I believe so.

15 **Q** What do you believe you told them?

16 **A** I wasn't going to be a part of the neglect, the
17 medical BS that went on there. We were there to help
18 people, and that's not what was happening.

19 **Q** During your however many months you were there,
20 however long you were there, did you ever hear any
21 commentary from other medical people about the quality of
22 medical care being rendered in the jail?

23 **A** Yes. There was lots of complaints from --

24 **Q** I'm talking about from medical people.

25 **A** Yes. There -- yes. My coworkers, just --

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1 there was select few, but we all complained to each
2 other. It was like a little group of us.

3 **Q** What kind of complaints regarding medical care
4 being rendered to detainees did you hear from other
5 medical people?

6 **A** People weren't getting seen, sick calls were
7 getting ignored and thrown in the trash, they were
8 getting tired of hearing there's nothing wrong with them.

9 **Q** You were hearing that from other medical
10 people?

11 **A** Yes.

12 **Q** Were any of those medical people that you heard
13 that from superior to you?

14 **A** No.

15 **Q** Same level people?

16 **A** Yes.

17 **Q** Did you ever hear any discussion from jail
18 detention staff, personnel, regarding quality of medical
19 care being rendered to detainees?

20 **A** Yes.

21 **Q** What type of -- well, what communications did
22 you hear or receive from jail detention staff personnel
23 regarding quality of medical care?

24 **A** Taking people up there and them not even seeing
25 them, sending them right back. They were getting tired

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1 of that. They were getting tired of -- of problems
2 getting thrown to the wayside. It -- it was a problem if
3 people were brought to the clinic.

4 Q You heard that from jail staff?

5 A Oh, yes.

6 Q Are you able to identify any particular jail
7 staff who made those kind of remarks?

8 A Crystal Hawk is one of them. Alexis Breshers,
9 I couldn't name -- I couldn't name all of them.

10 Q Can you name any others?

11 A Smith, I think was his last name. I don't know
12 his first name, though. He's a tall, skinny black kid.

13 Q Are you aware of other detainees having
14 suffered harm from the type of medical treatment that was
15 being rendered or not rendered at the jail?

16 A As in?

17 Q I don't mean deaths. Just people that weren't
18 being given proper medical care. Are you aware?

19 A Yes.

20 Q Who are the persons at the jail that were the
21 decision makers regarding medical care?

22 A As far as getting sent out, it was up to the
23 charge nurse or whoever was the charge nurse that day.

24 Q Are you telling me that Shirley Reisch could
25 have made the decision to send out a person?

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1 **A** Absolutely.

2 **Q** Is there anybody below the charge nurse level
3 that could have made that decision?

4 **A** No.

5 **Q** In terms of the chain of command, that
6 information has to get to the charge nurse?

7 **A** Yes.

8 **Q** Then the charge nurse can do it?

9 **A** Yes.

10 **Q** Presumably, then, anybody above the charge
11 nurse can do it?

12 **A** Yes.

13 MR. SHADID: Pass the witness.

14 EXAMINATION

15 BY MR. HEGGY:

16 **Q** Ms. Sanford, if you'll turn to Exhibit 26,
17 there in front of you.

18 **A** Okay.

19 **Q** This is a statement you gave, is it not?

20 **A** Yes, it is.

21 **Q** And you gave it -- it's dated December 31,
22 2018, at the top. Do you see that?

23 **A** Yes.

24 **Q** Is that the date that you wrote it?

25 **A** Yes.